

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

DONALD J. and MARY S. MOREAUX,
Individually and on Behalf of all Others Similarly
Situated,

Plaintiffs,

VS.

LINCOLN EDUCATIONAL SERVICES
CORP., DAVID F. CARNEY, SHAUN E.
MCALMONT AND CESAR RIBEIRO,

Defendants.

No. 2:10-cv-04160-SRC

ROBERT LYATHAUD, Individually and on
Behalf of all Others Similarly Situated,

Plaintiffs,

VS.

LINCOLN EDUCATIONAL SERVICES
CORP., DAVID F. CARNEY, SHAUN E.
MCALMONT AND CESAR RIBEIRO,

Defendants.

No. 2:10-cv-04926-SDW -MCA

**NOTICE OF WITHDRAWAL OF THE MOREAUX GROUP'S MOTION
TO CONSOLIDATE RELATED ACTIONS; TO BE APPOINTED LEAD PLAINTIFF;
AND TO APPROVE THE MOREAUX GROUP'S CHOICE OF COUNSEL**

Lead plaintiff movants Donald Moreaux, Mary Moreaux, Mike Schweertmann, Edward Mitchell, and Ray Vincent (collectively, the “Moreaux Group” or “Movant”) hereby withdraw their motion to consolidate related actions, to be appointed lead plaintiff, and to approve the Moreaux Groups’ choice of counsel.

This withdrawal is made without prejudice as to the rights of Donald Moreaux, Mary Moreaux, Mike Schweertmann, Edward Mitchell, and Ray Vincent to participate in this action as members of the proposed Class and to share in any settlement or recovery.

Dated: November 12, 2010

/s/ Paul A. Garfield

PAUL A. GARFIELD
SAMUEL L. DAVIS
DAVIS, SAPERSTEIN & SALOMON, P.C.
375 Cedar Lane
Teaneck, NJ 07666
Telephone: (201) 907-5000
Facsimile: (201) 692-0444
Email: sam@dsslaw.com

Local Counsel for Plaintiffs

KIM MILLER
KAHN SWICK & FOTI, LLC
500 Fifth Avenue, Ste. 1810
New York, NY 10110
Telephone: (212) 696-3730
Facsimile: (504) 455-1498
Email: kim.miller@ksfcounsel.com

LEWIS KAHN
KAHN SWICK & FOTI, LLC
206 Covington Street
Madisonville, Louisiana 70447
Telephone: (504) 455-1400
Facsimile: (504) 455-1498
Email: lewis.kahn@ksfcounsel.com

**Attorneys for Plaintiffs and Proposed Lead
Counsel for the Class**

CERTIFICATE OF SERVICE

I hereby certify that on November 12, 2010, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses registered, as denoted on the attached Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to non-CM/ECF participants.

/s/ Paul A. Garfield